

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Jason Freeman

Case: 2:21-mj-30242

Assigned To : Unassigned

Date: 5/25/2021

CMP USA V SEALED

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 5, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. 922(g)(1)

*Offense Description*  
Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 25, 2021

City and state: Detroit, Michigan

*Sara Choi*

*Complainant's signature*

Sara Choi, Special Agent

*Printed name and title*

*GI*

*Judge's signature*

Curtis Ivy, Jr. United States Magistrate Judge

*Printed name and title*

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## **AFFIDAVIT**

I, Special Agent Sara L. Choi, being sworn, depose and state the following:

1. I make this affidavit from personal knowledge based on my participation in this investigation, with the exception of the matters expressly stated, which are based on the information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all details of facts that exist pertaining to the investigation.
2. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since March 2020. I am currently assigned to the Detroit, Michigan Field Division, Group VII. I am tasked with investigating violations of firearms and narcotics laws. In addition, I have been involved in numerous criminal investigations involving violations of both state and federal laws. Prior to my employment with ATF, I was employed by the Kalamazoo Department of Public Safety for thirteen years as a uniformed Public Safety Officer (11 years) as well as a Detective (2 years) assigned to the Criminal Investigations Division. Further, I have obtained numerous State Search Warrants resulting in the seizure of evidence, including firearms and ammunition. In addition, I have completed the Grand Rapids C.C. Police

Academy, Kalamazoo Department of Public Safety Advanced Police Academy, Firefighting Academy (State of Michigan), FBI's Hazardous Devices School, FBI's Basic Hostage Negotiator School and have completed both the Criminal Investigator Training Program and Special Agent Basic Training Program at the Federal Law Enforcement Training Center.

3. I am currently conducting an investigation of Jason Keith FREEMAN, date of birth XX/XX/84, for being a felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g)(1).
4. On March 5, 2021 Detroit Police Department (DPD) Officers Hanson and Ethington ("Officers") were patrolling the area of Rossiter and McCormick at approximately 9:35 pm. Officer Hanson observed a black male walking with an L-shape bulge under his clothing on his right hip, which Officer Hanson recognized from his training and experience, as being consistent with a concealed firearm. When Officers exited their vehicle to investigate further, the male later identified as Jason FREEMAN, fled on foot. Officers observed FREEMAN holding his right side as he fled, an action indicative of an individual concealing/possessing a firearm. After a short pursuit, FREEMAN fell to the ground in the backyard of a residence. Officers secured handcuffs on FREEMAN while he was on the ground. Once on his feet, Officers discovered a

firearm in the right pant leg of FREEMAN's sweatpants. The recovered firearm was a loaded Remington RP9 9mm pistol, serial number RP034234H, with 14 live 9mm rounds and 1 round in the chamber. FREEMAN advised officers he did not have a "CPL" (Concealed Pistol License). FREEMAN was arrested by DPD Officers for carrying a concealed pistol without a license.

5. On May 19, 2021, I reviewed Jason Keith FREEMAN's criminal history as provided by the National Crime Information Center (NCIC). The criminal history report showed the following felony convictions for Jason Keith FREEMAN:

- 2002- 1. Felony Assault w/Intent to do Great Bodily Harm Less Than Murder and 2. Felony Weapons, 3<sup>rd</sup> Circuit Court Detroit, Michigan
- 2015- Felony Assault w/Intent to do Great Bodily Harm Less Than Murder, 3<sup>rd</sup> Circuit Court Detroit, Michigan

6. ATF Special Agent and Interstate Nexus Expert Mike Jacobs determined that the Remington RP9, 9mm pistol, serial number RP034234H, seized from FREEMAN is a "firearm" as defined under Title 18, United States Code, Section 921(a)(3), and that the firearm was manufactured outside the State of Michigan, and thus, had traveled in or affected interstate commerce.

7. Based on the foregoing, there is probable cause to believe that Jason Keith FREEMAN, knowingly and intentionally possessed a firearm, after having been convicted of a felony and that the firearm FREEMAN possessed traveled in or affected interstate commerce in violation of Title 18, United States Code, Section 922(g)(1).



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Sara L. Choi, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn and subscribed before me on this 25th day of May 2021.



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HONORABLE CURTIS IVY, JR.  
UNITED STATES MAGISTRATE JUDGE